

UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

JOHNNY M. HUNT,)	
)	
<i>Plaintiff,</i>)	
)	No. 3:23-cv-00243
v.)	
)	JUDGE CAMPBELL
SOUTHERN BAPTIST CONVENTION;)	MAGISTRATE JUDGE FRENSELY
GUIDEPOST SOLUTIONS LLC; and)	
EXECUTIVE COMMITTEE OF THE)	JURY DEMAND
SOUTHERN BAPTIST CONVENTION,)	
)	
<i>Defendants.</i>)	

**AMENDED 30(b)(6) NOTICE OF DEPOSITION OF THE SOUTHERN BAPTIST
CONVENTION**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff will take the deposition of a representative by oral examination of the **SOUTHERN BAPTIST CONVENTION** ("SBC") at **Taylor, Pigue, Marchetti & Blair, PLLC, 2908 Poston Avenue, Nashville, TN 37203** on **February 28, 2024**. The deposition will commence at 9:00am Central Time and will continue day-to-day until completed.

The deposition will be transcribed by a court reporter, may be videotaped, and will continue day-to-day until completed. Counsel are invited to attend and cross-examine. The Southern Baptist Convention shall designate one or more officers, directors, managing agents, executive officers, or other persons duly authorized and consenting to testify on its behalf on the topics below. No later than three (3) business days prior to the deposition, the Southern Baptist Convention shall identify the person(s) who will testify on its behalf pursuant to this notice and the matter(s) about which each person will testify.

Definitions

1. “SBC,” “you,” and “your” refers to Defendant Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.
2. “Johnny Hunt” refers to Plaintiff Johnny M. Hunt.
3. “Complaint” refers to the Complaint in this matter and any subsequent amendments.
4. “Report” refers to the “Report of the Independent Investigation, The Southern Baptist Convention Executive Committee’s Response to Sexual Abuse Allegations and an Audit of the Procedures and Actions of the Credentials Committee” and any versions or drafts of the same.
5. “Complainant” refers to the woman mentioned in the Report who made allegations against Plaintiff.
6. “Guidepost” means to Guidepost Solutions LLC and its respective successors or predecessors in interest, parents, subsidiaries, divisions, affiliates, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.
7. “Executive Committee” means Defendant Executive Committee of the Southern Baptist Convention and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

8. “Task Force” means the SBC Task Force as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

9. “Cooperation Committee” means the Committee on Cooperation of the Executive Committee as defined in the Complaint and its respective successors or predecessors in interest, affiliates, members, directors, officers, agents, employees, and/or independent contractors, consultants, and all persons (including, without limitation, its attorneys, accountants, and advisors) acting or purporting to act on its behalf.

Topics

1. The SBC's organizational structure, including constitution, by-laws, and the establishment of the Committee on Cooperation.
2. The engagement and retention of Guidepost for the Report, including the events that led to the need for an investigation, the scope of work under the engagement letter, and approval process for the Report.
3. The total amount of time billed by Guidepost for work on the Report and the total amount of money that Guidepost was paid for that work.
4. The definition for sexual abuse adopted during the 2022 meeting of the Southern Baptist Convention: "Sexual abuse is defined as any sexual act that could result in criminal charges or civil liability in the jurisdiction where it occurred." See https://www.sataskforce.net/updates/task-force-challenges-and-formal-recommendations-sn54p#_ftn1
5. The Southern Baptist Convention Credentials Committee letter to Hiland Park Baptist Church and any similar communications to other churches. (Doc. 1-4).
6. The respective roles played by the Executive Committee, the SBC, the Task Force, and the Cooperation Committee in the review, drafting, and editing of the Report prior to its publication, including the identities of the individuals for each of these entities who were involved.
7. Publication of the Report.
8. All edits, comments, feedback, and/or suggestions provided by any member of the Executive Committee, the SBC, the Task Force, and the Cooperation Committee to Guidepost on any version of the Report and Guidepost's response to same.
9. All deliberations and communications regarding the decision to include the allegations against Plaintiff in the Report.
10. Any material that anyone requested be removed from any version or portion of the Report, including Guidepost's response to the request.
11. All materials relating to the allegations against Plaintiff in the Report that were made available to the Executive Committee, SBC, Task Force and Cooperation Committee prior to the Report's publication.
12. Any communications with Guidepost relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.

13. Any communications between members of the SBC relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
14. Any communications with the Executive Committee relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
15. Any communications with third parties relating to the allegations against Plaintiff or the decision to include Plaintiff's name in the Report. This includes communications after publication of the Report.
16. The publication of the Report to any third party, including dissemination by email, hyperlink, or other electronic means.
17. Any communications with Complainant and Complaint's husband.
18. All communications after the Report's publication with churches, seminaries, schools, and publishers relating to Plaintiff or the Complainant's allegations against Plaintiff.
19. Bart Barber's Tweet attached to the Complaint. (Doc. 1-3).
20. Bart Barber's public posts regarding Plaintiff.
21. SBC members' public posts regarding Plaintiff.
22. Baptist Press articles regarding the Report and the allegations against Plaintiff.
23. The role of the liaison between Guidepost and the Executive Committee regarding Plaintiff.
24. Any communications with the liaison concerning Plaintiff.
25. The demand letter sent to the SBC from Plaintiff's counsel. (Doc. 1-5).
26. The SBC's discovery responses.
27. The Ministry Check initiative, including the standards for credibly accused and the engagement of Guidepost for the initiative.

Dated: February 19, 2024

/s/ Robert D. MacGill

Robert D. MacGill, Esq. (*pro hac vice*)

Scott E. Murray, Esq. (*pro hac vice*)

Patrick J. Sanders, Esq. (*pro hac vice*)

MACGILL PC

156 E. Market St.

Suite 1200

Indianapolis, IN 46204

(317) 721-1253

robert.macgill@macgilllaw.com

scott.murray@macgilllaw.com

patrick.sanders@macgilllaw.com

-and-

Todd G. Cole, Esq., BPR # 031078

Andrew Goldstein, Esq., BPR # 037042

COLE LAW GROUP, P.C.

1648 Westgate Circle, Suite 301

Brentwood, TN 37027

Telephone: (615) 490-6020

Fax: (615) 942-5914

tcole@colelawgroup.com

agoldstein@colelawgroup.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on February 19, 2024, on the following counsel via email only:

/s/ Patrick J. Sanders
Counsel for Plaintiff Johnny Hunt

Scarlett Singleton Nokes, Esq.
R. Brandon Bundren, Esq.
E. Todd Presnell
BRADLEY ARANT BOULT CUMMINGS LLP
1600 Division Street, Suite 700
Nashville, Tennessee 37203
Telephone: (615) 244-2582
snokes@bradley.com
bbundren@bradley.com
tpresnell@bradley.com

Gene R. Besen, Esq.
BRADLEY ARANT BOULT CUMMINGS LLP Fountain Place
1445 Ross Avenue, Suite 3600
Dallas, Texas 75202

Thomas J. Hurney, Jr., Esq.
Gretchen M. Callas, Esq.
JACKSON KELLY PLLC
500 Lee Street East, Suite 1600
Post Office Box 553
Charleston, West Virginia 25322
Telephone: 304-340-1000
thurney@jacksonkelly.com
gcallas@jacksonkelly.com

Counsel for the Executive Committee of the Southern Baptist Convention

John R. Jacobson, Esq.
Katharine R. Klein, Esq.
RILEY & JACOBSON, PLC
1906 West End Avenue
Nashville, TN 37203
Telephone: (615) 320-3700
jjacobson@rjfirm.com
kklein@rjfirm.com

Steven G. Mintz (admitted pro hac vice)
Terence W. McCormick (admitted pro hac vice)
Scott Klein (admitted pro hac vice)
Mintz & Gold LLP
600 Third Avenue
25th Floor
New York, NY 10016
Telephone: (212) 696-4848
mintz@mintzandgold.com
mccormick@mintzandgold.com
klein@mintzandgold.com

Counsel for Guidepost Solutions LLC

L. Gino Marchetti, Jr., Esq.
Matt C. Pietsch, Esq.
TAYLOR, PIGUE, MARCHETTI & BLAIR, PLLC
2908 Poston Avenue
Nashville, TN 37203
Telephone: (615) 320-3225
gmarchetti@tpmblaw.com
matt@tpmblaw.com

Counsel for the Southern Baptist Convention